



Eric Gonzalez
District Attorney

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: PAUL PIERRE

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS PIERRE WAS ADJUDICATED GUILTY OF AND ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENT CHARGES ARISING OUT OF AN INCIDENT ON 02/02/2009 WHILE MOS PIERRE WAS ASSIGNED TO THE TRANSIT BUREAU DISTRICT # 34, ON DUTY, AND ASSIGNED TO PATROL:

ALLEGATION(S):

1. MOS PIERRE, FAILED TO PERFORM MOS'S DUTIES AS DIRECTED AND WAS OFF POST, TO WIT: SAID MOS WAS SCHEDULED TO BE ON A DIRECTED PATROL FROM 0300 HOURS TO 0345 HOURS AT A LOCATION KNOWN TO THE DEPARTMENT, BUT WAS OBSERVED SLEEPING AT APPROXIMATELY 0310 HOURS UNTIL 0315 HOURS, IN A LOCATION KNOWN TO THE DEPARTMENT.
2. MOS PIERRE, WRONGFULLY NEGLECTED TO MAKE APPROPRIATE ACTIVITY LOG ENTRIES, AS REQUIRED.
3. MOS PIERRE, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT IN THAT SAID MOS WAS OBSERVED SLEEPING IN SAID MOS'S ASSIGNED VEHICLE.

CASE STATUS: CLOSED ON 02/12/2013.

ACTION TAKEN: FORFEIT THIRTY (30) VACATION DAYS. THIS PENALTY WAS SHARED WITH THE PENALTY FOR DISCLOSURE # 2.

Disclosure # 2:

MOS WAS ADJUDICATED GUILTY AFTER TRIAL OF THE FOLLOWING DEPARTMENT CHARGES ARISING OUT OF AN INCIDENT ON OR ABOUT 11/14/2010 WHILE MOS PIERRE WAS ON DUTY AND ASSIGNED TO TRANSIT DISTRICT 34:

ALLEGATION(S):

1. MOS PIERRE, WAS OFF POST WITHOUT PERMISSION OR POLICE NECESSITY.
2. MOS PIERRE, FAILED TO MAKE APPROPRIATE ENTRIES THAT SAID MOS CLAIMED TO HAVE PERFORMED IN THE DEPARTMENT ISSUED ACTIVITY LOG.

CASE STATUS: CLOSED ON 02/12/2013.

ACTION TAKEN: FORFEIT THIRTY (30) VACATION DAYS. THIS PENALTY WAS SHARED WITH THE PENALTY FOR DISCLOSURE # 1.

Disclosure # 3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 08/17/2012, AGAINST MOS PIERRE:
ALLEGATION(S):

1. OTHER DEPARTMENT RULES-PROCEDURES/FAIL TO NOTIFY IAB

CASE STATUS: CLOSED ON 01/01/2014.

Disclosure # 4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 06/19/2017, AGAINST MOS PIERRE:
ALLEGATION(S):

1. FAIL TO PREPARE REPORT – CITY INVOLVED ACCIDENT REPORT

CASE STATUS: CLOSED ON 10/12/2017.

ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE ISSUED.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County